



United States Courts
Southern District of Texas
FILED

MAY 03 2024

Nathan Ochsner, Clerk of Court

May 3, 2024
Via Hand Filing

Honorable George C. Hanks Jr.
United States Courthouse
515 Rusk Street, Room 6202
Houston, Texas 77002

Re: James F. b/n/f Christine F. and Michael F. v.
Clear Creek Independent School District,
Civil Action No. 4:23-cv-02063; United States
District Court for the Southern District of
Texas - Houston Division - Request to Extend
Deadline to Respond to Plaintiff's Motion for
Admission of Additional Evidence - Unopposed

Dear Judge Hanks:

We represent the Defendant in the above case. May 3, 2024, is the date by which the Defendant must file its opposition to the Plaintiff's Motion for Admission of Additional Evidence. We are not able to complete and file the Defendant's objections today. The computer and operating system at Thompson & Horton LLP has been completely shut down due to outside interference.

T&H

We have no access to any documents, emails, or any systems to send or receive documents. Today, I talked with a very helpful person in the office of the District Court Clerk who advised that we could file this handwritten letter in the Court's records requesting an extension of the deadline to respond to the Plaintiff's motion, thus this letter is being filed today.

I have spoken with opposing counsel, Mark Whitburn, today about our situation. He is not opposed to this request to extend the deadline for the Defendant to file its objections to the Plaintiff's Motion for Admission of Additional Evidence to a time when our office is able to create and send and receive documents.

Based on the foregoing information, the Defendant requests that the Court extend the deadline to respond to the Plaintiff's Motion for Admission of Additional Evidence to a date when counsel for the Defendant once again has a document creation and management system that is operational.

T&H

Certificate of Conference

On May 3, 2024, I spoke with counsel for the Plaintiff, Mark Whitburn.

Mr. Whitburn stated that the Plaintiff is not opposed to this request.

Respectfully Submitted,
Thompson & Horton LLP

Janet L. Horton

Janet L. Horton

Texas Bar No. 10021500

j.horton@thompsonhorton.com

Arlene P. Gonzalez

Texas Bar No. 24109079

agonzalez@thompsonhorton.com

(713) 554-6746 (telephone)

(713) 583-8997 (fax)

Phoenix Tower, Suite 8000

3200 Southwest Freeway

Houston, Texas 77027-7554

Attorneys for Defendant

Clear Creek ISD

Certificate of Service

This is to certify that on May 3, 2024, a picture of this letter was sent by text to the phone of Mark Whitburn at 682-521-4789.

Janet L. Horton